Hearing Date and Time: November 30, 2006 at 10:00 am Response Date and Time: November 24, 2006 at 4:00 p.m.

## PEPPER HAMILTON LLP

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Attorneys for Teleflex Incorporated, d/b/a Teleflex Morse

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re	
	) Chapter 11
DELPHI CORPORATION, et al.,	)
	) Case Nos. 05-44481 (RDD
Debtors.	)
	) Jointly Administered
	)

## RESPONSE OF TELEFLEX INCORPORATED, d/b/a TELEFLEX MORSE TO DEBTORS' SECOND OMNIBUS OBJECTION TO CLAIMS

Teleflex Incorporated, d/b/a Teleflex Morse ("Teleflex"), by and through its undersigned counsel, responds to the Debtors' Second Omnibus Objection (Procedural) to Claims (the "Objection"), as follows:

- 1. The Debtors commenced these Chapter 11 cases on October 8, 2005 (the "Petition Date").
- 2. Prior to the Petition Date, Teleflex sold and delivered goods (the "Goods") on credit to an entity or entities doing business as "Delphi," "Delphi Saginaw Steering System," and "Delphi Energy and Engine" (collectively, the "Delphi Entity.") The indebtedness owed by the Delphi Entity for the Goods as of the Petition Date was \$59,962.24 (the "Indebtedness").

05-44481-rdd Doc 5650 Filed 11/21/06 Entered 11/21/06 17:46:11 Main Document Pg 2 of 3

- 3. Because Teleflex was unable to determine the precise corporate identity of the Delphi Entity, it filed proofs of the claim for the Indebtedness against both Delphi Corporation and Delphi Automotive Systems, LLC. On or about January 30, 2006, Teleflex filed a timely proof of claim, designated as Claim No. 1700, asserting a claim against Delphi Corporation in the total amount of \$59,962.24. On or about the same date, Teleflex filed a timely proof of claim, designated as Claim No. 1703, asserting a claim against Teleflex Automotive Systems, LLC in the total amount of \$59,962.24.
- 4. In the Objection, the Debtors assert that Claim Nos. 1700 and 1703 are duplicates, and that Claim No. 1700 should be expunged.
- 5. Claim Nos. 1700 and 1703 are in fact not duplicates, since they are claims against different Debtors.
- 6. Teleflex is willing to consent to the expungement of Claim No. 1700, provided that the Debtors stipulate that they will not object to Claim No. 1703 on the ground the Indebtedness is owed not by Delphi Automotive Systems, LLC, but by Delphi Corporation and/or a different Debtor.
- 7. Any reply by the Debtors to this Response should be delivered to the undersigned counsel for Teleflex. The following person has ultimate authority to reconcile, settle or otherwise resolve Claim No. 1703 on behalf of Teleflex:

Bonnie MacDougal Kistler 3000 Two Logan Square 18<sup>th</sup> and Arch Streets Philadelphia, PA 19103 (215) 981-4000 WHEREFORE, Teleflex Incorporated, d/b/a Teleflex Morse, respectfully requests that the Court overrule the Objection and grant all other proper relief.

PEPPER HAMILTON/LLP

/s/ Linda J. Casey
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